

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
NO. 5:18-CR-452-1-FL

UNITED STATES OF AMERICA,

v.

LEONID ISAAKOVICH TEYF,

Defendant.

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**MOTION TO FILE REDACTED SEALED  
MOTION AND MEMORANDUM IN  
SUPPORT**

Leonid I. Teyf, by and through counsel, hereby moves for an order requiring the Government to file a redacted and unsealed Sealed Motion (DE 104) (the “Sealed Motion”). In support hereof, it is stated unto the Court:

On January 24, 2019 the Government filed the Sealed Motion (DE 104). On January 25, 2019, this Court granted the Government’s Motion to Seal the Sealed Motion (DE 107). The Government’s Sealed Motion involves matters of substantial interest to the public and specific legal constituencies on a variety of critical constitutional issues related to the First, Fifth, Sixth, and Fourteenth Amendments. Any information deemed confidential by the Government, including all identifying information regarding any person other than Mr. Teyf and information the Government has asserted has been provided to it or is available to it can be redacted and the sealed version will be available to the parties and the Court.

Mr. Teyf intends to seek the support of amici curiae, which is virtually impossible with the Sealed Motion under seal. (This Court has the inherent authority to invite and permit participation by amicus curiae to assist the Court in its proceedings. *See United States v. Louisiana*, 751 F.Supp. 608, 620 (E.D. La. 1990); *Resort Timeshare Resales, Inc. v. Stuart*, 764 F. Supp. 1495, 1500 (S.D. Fla. 1991).)

For these reasons, Mr. Teyf requests that this Court order the Government to file an unsealed and redacted Sealed Motion, so that potential amici curiae are able to review and provide input on a variety of critical constitutional issues related to the First, Fifth, Sixth, and Fourteenth Amendments.

This 6th day of February 2019.

/s/ James P. McLoughlin, Jr.  
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## CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of February, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I also served a copy of the foregoing upon counsel for the United States in this action by sending a copy to each counsel by electronic communication as referenced below:

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